

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

SHAWN DRUMGOLD,
Plaintiff

V.

TIMOTHY CALLAHAN, FRANCIS
M. ROACHE, PAUL MURPHY,
RICHARD WALSH and THE CITY
OF BOSTON,
Defendants

04-CV-11193-NG

ASSENTED TO MOTION FOR LEAVE TO ENLARGE TIME TO FILE
ANSWERS OR DISPOSITIVE PLEADINGS

Now come the defendants, Francis M. Roache and the City of Boston, parties in the above-entitled civil action through their counsel pursuant to F.R.C.P. Rule 6(b)(1) and hereby request that this Honorable Court grant leave to file Answers of Defendants Francis M. Roache and the City of Boston until January 13, 2005.

As grounds for this motion, the Defendants state as follows:

1. That Defendants Roache and the City of Boston need additional time to pursue negotiations with Plaintiff's counsel relative to a proposed stipulation of the parties for the dismissal of Plaintiff's claims against Defendants Roache and the City of Boston based on certain conditions that are currently in negotiation.

2. That if this Honorable Court were to allow Defendants' motion for an enlargement of time for the filing of their responsive pleadings, it is unlikely Plaintiff would in any way be prejudiced.

3. That this request is both reasonable and necessary in order for the Defendants Roache and the City of Boston to respond to the Plaintiff's allegations in their Answers.

4. That Plaintiff's counsel has assented counsel to this Motion.

WHEREFORE, the parties respectfully request this Honorable Court enlarge the time in which Defendants the City of Boston and Francis M. Roache must file their Answers in this matter no later than January 13, 2005.

Assented to by,

Plaintiff, Shawn Drumgold
By his attorneys,

//S//Stephen Hrones
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Hrones and Garrity
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(617) 227-4019

Respectfully submitted,

Defendants, the City of Boston and
Francis M. Roache
By their attorneys,

//S//John P. Roache
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//S//Rosemary Curran Scappicchio
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Dated: January 7, 2005

**DEFENDANTS' CERTIFICATION PURSUANT TO
LOCAL RULE 7.1(A)(2)**

I hereby certify, pursuant to Local Rule 7.1(A)(2), that counsel for the Defendants, the City of Boston and Francis M. Roache, has conferred with Stephen Hrones, counsel for the Plaintiff in the above-entitled action, in a good faith attempt to resolve or narrow the issues raised by the instant motions, and that counsel for the Plaintiff has no opposition to the within motion.

//S//Patrick J. Donnelly
Patrick J. Donnelly, BBO#651113